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*Attorneys for Defendant*  
*Synthes USA SALES, LLC i/s/h/a Synthes, Inc.*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

-----X  
SUSAN JACOBSON and MICHAEL KALAROFF, her husband, Civil Action No.:  
11-cv-01160(AET) (DEA)

Plaintiffs,

-against-

SYNTHES, INC., JAMES F. COZZARELLI, M.D.,  
JOHN DOES, M.D. 1-15, JOHN DOES 1-15 and ABC  
CORPS. 1-15 (fictitious names),

Defendant.  
-----X

**STIPULATED ORDER OF CONFIDENTIALITY**

IT IS HEREBY STIPULATED by and between plaintiffs, SUSAN JACOBSON and MICHAEL KALAROFF, her husband, (hereinafter referred to collectively as "Plaintiffs") by and through their counsel, REARDON ANDERSON LLC; and defendant SYNTHES USA SALES, LLC i/s/h/a SYNTHES, INC. (hereinafter referred to as "Synthes"), by and through its counsel, SEDGWICK LLP, as follows:

1. Synthes will produce to plaintiffs certain documents related to this litigation.
2. Synthes may designate as "CONFIDENTIAL" any document, material or information that Synthes considers to be a confidential trade secret, proprietary information, or privileged information. Any document so designated will be subject to the provisions of

this Stipulated Order. Synthes does not waive any right to assert the privilege of confidentiality by permitting the inspection of the documents.

3. In the event that plaintiffs disagree with any designation of confidential information asserted by Synthes, plaintiffs may move the Court to compel a hearing to resolve the issue. It shall then be Synthes' burden, the same as if this Stipulated Order had not been entered into, to establish that it is entitled to assert a privilege as to the contested information.

4. No party waives any right to appeal any Order issued by the court with respect to material and information subject to this Stipulated Order.

5. All information obtained from inspection of the documents produced by Synthes shall be used only in connection with this action and shall not be used in connection with any other lawsuit or for any other purpose without specific assent to this Stipulated Order. Under no circumstances shall any document subject to this Stipulated Order or information contained in any such document be disseminated to any person, firm, or organization for any purpose other than for use in connection with this action or without specific assent to this Stipulated Order.

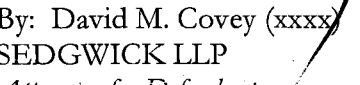
6. All documents produced, copies of such documents reproduced pursuant to this Stipulated Order, and all notes arising from the examination of such documents, taken by whomever and in whatever form, shall, within thirty (30) days of the conclusion of the action, be returned to counsel for Synthes or destroyed. If destroyed, plaintiffs' counsel shall provide a certification attesting to the destruction of the documents.

7. No person shall be allowed to disclose, by any means whatsoever, any portion of any material and information or any notes arising therefrom until the person to whom disclosure is to be made has:

- (a) Read this Stipulated Order in its entirety; and
- (b) Signed the attached Acknowledgment of this Stipulated Order signifying agreement to its provisions and consent to the jurisdiction of the Court over his or her person for any proceedings involving alleged improper disclosure.

Dated: August 25, 2011

  
By: Eric Anderson, Esq.  
REARDON ANDERSON LLC  
*Attorneys for Plaintiffs*  
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Tinton Falls, New Jersey 07701  
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125 Broad Street, 39th Floor  
New York, New York 10004  
T: (212) 422-0202  
SDMA File No.: 00484-020548

SO ORDERED:

By: \_\_\_\_\_

Dated:

SEDGWICK LLP  
125 Broad Street, 39th Floor  
New York, New York 10004-2400  
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Defendant.

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**ACKNOWLEDGMENT OF STIPULATED ORDER OF CONFIDENTIALITY**

I, \_\_\_\_\_, hereby acknowledge that I have read the  
foregoing Stipulated Order and agree to be bound by its provisions. I further consent to the  
jurisdiction of this Court over my person for any proceeding involving alleged improper  
disclosure of protected documents or information.

Dated:

BY: \_\_\_\_\_